

August 6, 2025

### **Request To Permanently Seal / Permanently Redact**

Judge Liman,

I - Mario Armando Lavandeira, Jr., known professionally as Perez Hilton - write as a nonparty in Lively v. Wayfarer Studios LLC (1:24-cv-10049) to request the court permanently seal and / or permanently redact my personally identifiable information.

As your Honor himself previously told me when denying my motion for a protective order, this court already has protections in place for my real safety concerns. “The Court already has taken measures to protect the privacy of third parties in this matter.” Docket #505 - dated July 28, 2025.

Per your Honor’s instructions, I am officially writing to:

- Designate that my home address is “Attorney’s Eyes Only”, this is nonpublic materials the public disclosure of which “will cause harm to the . . . personal interests of the producing person and/or a third party to whom a duty of confidentiality is owed.”
- Move the court to permanently seal or permanently redact Exhibit A in docket #595, the subpoena served on me with my home address listed.
- Request that any other instances in any filings current and any future filings that may list my home address, either redacted or unredacted, be permanently redacted without me even having to request that again.

As I already shared with this court, this case has garnered great interest and threats have already been made against parties and non-parties alike. Your Honor has previously assured me that he will protect my privacy and help ensure my safety.

I now ask your honor to deliver on that.

Additionally, I also write to:

- Designate that my phone number and email address listed in these documents are Confidential and be permanently redacted in current and any future filings, without me having to even request that. My phone number and email address listed in these documents are not publicly available and the public disclosure of which “will cause harm to the . . . personal interests of the producing person and/or a thirty party to whom a duty of confidentiality is owed.”

This is all a matter of real and grave concern.

Thank you for your anticipated help with this.

Respectfully submitted,

/s/ Mario Armando Lavandeira, Jr.

Mario Armando Lavandeira, Jr.

aka Perez Hilton